

Remarks

Reconsideration of this Application is respectfully requested. Upon entry of the foregoing amendment, claims 12-30 are pending in the application, with claims 12, 18, and 25 being the independent claims. Claims 1-11 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. Applicants seek to amend claims 12, 18, and 25. These changes are believed to introduce no new matter, and their entry is respectfully requested. Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Even though the Examiner conducted an analysis under 35 U.S.C 103(a) to reject claims 12, 15-16, 18-20, and 25-27, the Office Action on p. 3 states that these claims were rejected under 35 U.S.C § 102(e). This appears to be a misprint, and the following remarks assume that the Examiner intended to reject these claims under 35 U.S.C § 103(a).

Rejections Under 35 U.S.C. § 103

Claims 12, 15-16, 18-20, and 25-27 were rejected in the Office Action dated 05/17/2007 ("Office Action") under 35 U.S.C. § 103(a) as being unpatentable over PG Publication No 2003/0120791 to Weber *et al.* ("Weber") in view of PG Publication No 2001/0017595 to Cliff *et al.* ("Cliff"). For the reasons set forth below, Applicants respectfully traverse the rejection of claims 12, 15-16, 18-20, and 25-27.

Claim 12 recites "*a plurality of programmable pads ... wherein at least one of said programmable pads is configured to either send or receive data after having been*

configured to comply with said data protocol and electrical specification." As explained below, neither Weber nor Cliff teaches or suggests the highlighted features.

Weber teaches a reception path in a communication controller. (Weber, FIG. 4, ¶. 0023.) Weber recites that "a deserializer portion of serializer/deserializer circuits 410-413 may convert higher speed serial data to lower-speed parallel data." (Weber, ¶. 0033.) Then, aggregators 440-443 receive this lower-speed parallel data, and "align the data properly according to a desired protocol definition." (Weber, ¶. 0033.) Further, "[p]rotocol processors 450-453 may process the data" according to the protocol defined by the aggregators 440-443. (Weber, ¶. 0024.) Therefore, the protocol definition is chosen after selecting the deserializer mode for one or more circuits 410-413. Selecting the deserializer mode of operation for one or more circuits 410-413 establishes the reception or "input" path(s). Claim 12, on the other hand, teaches or suggests choosing protocol definitions for one or more programmable pads before choosing to operate one or more of the pads in either the input or output mode.

Further, Weber also teaches a transmission path in a communication controller. (Weber, FIG. 4, ¶. 0024.) In Weber, a "protocol processor 450-453 and alternate protocol processor 455 may maintain a parallel word that is sent to data presenter 460-463." (Weber, ¶. 0024.) Then, a "[d]ata presenter 460-463 may perform an algorithm on the data to present data according to a desired protocol definition." (Weber, ¶. 0024.) Weber proceeds to teach that the transmission process "utilizes a serializer portion" of a serializer/deserializer circuit. (Weber, ¶. 0025.) However, the decision of operating a particular serializer/deserializer circuit in the serializer mode must have necessarily been made prior to the involvement of data presenters in the transmission process. This is because the transmission path is distinct from the reception path, and data presenters are

only present on the transmission path. Therefore, when data is sent from the protocol processor to a data presenter or from the alternate protocol processor to one or more data presenters, a decision has already been made to operate the intended serializer/deserializer circuit(s) in a transmission ("output") mode. Again, unlike Weber, claim 12 recites choosing protocol definitions for one or more programmable pads before choosing to operate one or more of the pads in either the input or output mode.

For the above reasons, Weber fails to teach or suggest all the recited features of claim 12. Cliff is directed to a programmable voltage regulator. Cliff is not being used by the Examiner to teach or suggest the above highlighted features of claim 12, nor does Cliff teach or suggest these features. Thus, Cliff does not cure the deficiencies of Weber. Because each of the features in claim 12 are not taught or suggested in the combination of Weber and Cliff, a *prima facie* case of obviousness is not met in accordance with MPEP 2143.03 and *In re Ryoka*, 490 F.2d 981 (CCPA 1974).

Similar to claim 12, independent claims 18 and 25 recite features not present in the combination of Weber and Cliff. Independent claim 18, as amended, is directed to a method for programming a transceiver, and recites "*sending a first control signal that carries said protocol and electrical specification instructions,*" and "*sending a second control signal to instruct said programmable pad to function as an output or an input after executing said protocol and electrical specification instructions.*" Thus, similar to claim 12, claim 18 recites the feature of choosing a protocol definition for the programmable pad before choosing to operate the pad as either an input or an output. As explained above with respect to claim 12, neither Weber nor Cliff teaches or suggests the highlighted features of claim 18.

Independent claim 25, as amended, is directed to a transceiver that similarly includes the feature of "*control logic for executing said protocol instructions to configure said programmable pad, such that said programmable pad is configured to either send or receive data after having been configured to comply with said data protocol and said electrical specification.*" As explained above, neither Weber nor Cliff teach or suggest the highlighted features of claim 25. Applicants therefore respectfully request that the rejection of independent claims 12, 18, and 25 under 35 U.S.C. 103(a) be reconsidered and withdrawn because the combination of Weber and Cliff fail to teach or suggest every recited feature of the claims.

Dependent claims 15-16, 19-20, and 26-27 were also rejected under 35 U.S.C. 103(a) as being unpatentable over Weber in view of Cliff. Applicants respectfully request that the rejection of dependent claims 15-16, 19-20, and 26-27 be reconsidered and withdrawn as they depend from independently patentable base claims 12, 18, and 25, respectively, and in view of their own respective features.

Dependent claims 17, 21, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Weber in view of Cliff further in view of PG Publication No. 2003/0172332 to Rearick. Rearick is directed to "[s]ystems and methods for facilitating testing of pad drivers of integrated circuits" and does not overcome the deficiencies of Weber or Cliff vis-à-vis the above highlighted features, nor does the Examiner so allege. Applicants respectfully request that the rejection of dependent claims 17, 21, and 28 be reconsidered and withdrawn as they depend from independently patentable base claims 12, 18 and 25, respectively, and in view of their own respective features.

Dependent claims 13, 14, 22-24, 29, and 30 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over Weber in view of Cliff further in view of PG

Publication No 2001/0015664 to Taniguchi. Taniguchi is directed to a method for adjusting the delay time that includes the main step of “delaying the phase of the output signal until a phase difference between the phase of the input signal and the phase of the output signal becomes N periods.” Taniguchi does not overcome the deficiencies of Weber or Cliff vis-à-vis the above highlighted features, nor does the Examiner so allege. Applicants respectfully request that the rejection of dependent claims 13, 14, 22-24, 29, and 30 be reconsidered and withdrawn as they depend from independently patentable base claims 12, 18 and 25, and in view of their own respective features.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Jon E. Wright
Attorney for Applicants
Registration No. 50,720

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1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

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